

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB MDL No. 2323
THIS DOCUMENT RELATES TO: <i>ROY GREEN, et al. v. ARIZONA CARDINALS FOOTBALL CLUB LLC, corporate successor of ST. LOUIS CARDINALS, INC.</i>	Hon. Anita B. Brody No. 1422-CC00005-01, Circuit Court of St. Louis City, State of Missouri

DECLARATION OF DOUGLAS M. BURNS

DOUGLAS M. BURNS declares pursuant to 28 U.S.C. § 1746:

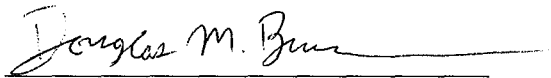
1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul, Weiss"), counsel to Defendants National Football League and NFL Properties LLC (collectively, the "NFL Defendants") in MDL No. 2323 and I am also counsel to the Arizona Cardinals Football Club LLC in the above-captioned matter. I respectfully submit this declaration in support of the Response of the National Football League and NFL Properties LLC in Opposition to the Motion by Roy Green, *et al.* for Relief from the Stay and Injunction as it Applies to *Green v. Arizona Cardinals Football Club LLC*.

2. Attached as Exhibit A is a true and correct copy of the *Green* Plaintiffs' First Interrogatories Directed to Defendant Arizona Cardinals, issued in *Green, et al. v. Arizona Cardinals Football Club LLC*, No. 1422-CC000005-001 (Mo. Cir. Ct. June 3, 2014).

3. Attached as Exhibit B is a true and correct copy of the *Green* Plaintiffs' Request for Production of Documents and Things to Defendant Arizona Cardinals, issued in *Green, et al. v. Arizona Cardinals Football Club LLC*, No. 1422-CC000005-001 (Mo. Cir. Ct. June 3, 2014).

4. I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on August 1, 2014


Douglas M. Burns